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May 14, 2025

By ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Courtroom 6B
New York, New York 10007-1312

MEMORANDUM ENDORSED

Re: Marc Restellini v. The Wildenstein Plattner Institute, Inc. et al
20 Civ. 4388 (AT) (GWG)

Dear Judge Gorenstein:

We write on behalf of Plaintiff Marc Restellini.

The parties have previously provided various updates regarding their settlement discussions and the Court initially stayed and then continued the stay of various litigation-related deadlines. The most recent stay expires on May 14, 2025. *See* ECF No. 199.

Over the past months, the parties have expended very significant time and resources to resolve this litigation and are very close to doing so. They have attended multiple all-day mediation sessions and exchanged at least a dozen drafts of a settlement agreement. At this point, the parties are working closely and productively with a mediator and have reached agreement on all major terms.

The Court will recall that the materials at issue in this litigation consist of a large repository of paper and electronic documents, which are divisible into several categories. Documenting the manner in which those materials will be treated going forward in the settlement agreement has made the resolution of the parties' dispute, and reducing this resolution to writing, complicated and time-consuming.

Over the last week, Restellini has communicated with the mediator regarding final and minor changes to the draft settlement agreement, which Restellini expects to sign in the coming days. Based on the foregoing, Restellini requests that the Court continue the stay until May 28, 2025, to permit the parties to finalize and execute their settlement agreement.

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Defendants indicated that they agree to one-week extension, but Restellini believes that a two-week extension is appropriate, including in light of the cadence of communications to-date (including with the mediator), and the fact that Restellini and his foreign counsel are located overseas.

Respectfully submitted,

McKOOOL SMITH P.C.

/s/ Daniel W. Levy

By: Daniel W. Levy

Extension of the stay of deadlines through and including May 28, 2025, is granted. If the case has not settled by that date, that parties shall file a joint letter with proposed dates for the remaining discovery deadlines in this case.

So Ordered.

Gabriel W. Korenstein
GABRIEL W. CORENSTEIN
United States Magistrate Judge

May 15, 2025